

STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0081418; AI 19006; PER20060001** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

- I. **THE APPLICANT IS:** Mo-Dad Utilities, LLC
 Southwood Village
 P.O. Box 790
 Denham Springs, LA 70726

- II. **PREPARED BY:** Ronda Burtch

- DATE PREPARED:** November 13, 2006

- III. **PERMIT ACTION:** Issue LPDES permit LA0081418, AI 19006; PER20060001

 LPDES application received: June 1, 2006

 LPDES permit issued: November 1, 2001
 LPDES permit expired: October 31, 2006

IV. **FACILITY INFORMATION:**

- A. The application is for the discharge of treated sanitary wastewater from a privately owned treatment works serving Hillside, Southwood Village, Parkwood, Parkridge, Oak Meadow, and Prairie Oaks Subdivisions.

- B. The permit application does not indicate the receipt of industrial wastewater.

- C. The facility is located on LA Hwy. 73, 1.25 miles SE of US Hwy. 61 in Prairieville, Ascension Parish.

- D. The treatment facility consists of a three-cell aeration/oxidation pond and post chlorination by tablet feeders and chlorine contact chambers for disinfectin prior to discharge.

- E. Outfall 001
 - Discharge Location: Latitude 30° 16' 52" North
 Longitude 90° 58' 28" West

 - Description: treated sanitary wastewater

 - Expected Flow: 730 homes x 400 gallons/day/home = 0.292 MGD
 81 mobile homes x 300 gallons/day/home = 0.0243 MGD
 12 two-bedroom apartments x 300 GPD = 0.0036 MGD

 - Total Expected Flow: 0.3199 MGD

Calculations for gallons per day were based upon figures obtained from Chapter 15 of the State of Louisiana Sanitary Code, Department of Health and Hospitals, Office of Public Health.

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Please note that if the facility grows to a discharge beyond the design capacity of the facility, additional sewage treatment may be required with prior approval of the facility's plans by the Louisiana Department of Health and Hospitals and notification must be submitted to the LDEQ. Also, if the expected flow reaches or exceeds the design capacity of the facility, a permit modification may be required.

Type of Flow Measurement which the facility is currently using:

Continuous Recorder

V. RECEIVING WATERS:

The discharge is into Grand Goudine Bayou, thence into the New River, thence into the Amite River in segment 040404 of the Lake Pontchartrain Basin. This segment is listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Segment 040404 of the Lake Pontchartrain Basin are as indicated in the table below^{1/}:

Overall Degree of Support for Segment 040404	Degree of Support of Each Use						
	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Not Supported	Not Supported	Not Supported	Not Supported	N/A	N/A	N/A	N/A

^{1/}The designated uses and degree of support for Segment 040404 of the Lake Pontchartrain Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 040404 of the Lake Pontchartrain Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the Memorandum of

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Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Ms. Ronda Burch
Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

Subsegment 040404, New River – Headwaters to New River Canal, is listed on LDEQ's Final 2004 303(d) List as impaired for organic enrichment/low DO and pathogen indicators. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the sanitary wastewater point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment, which could be attributed to pollutants, which were not determined to be discharged at a level that would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Organic Enrichment/Low Do

To protect against the potential for oxygen consuming pollutants that could cause instream DO problems and for the discharges of organic materials at levels exceeding state water quality standards, BOD₅ limitations have been placed in the permit.

Pathogen Indicators

To protect the waterbody against high levels of pathogenic organisms, fecal coliform limits have been established in the permit.

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Final Effluent Limits:

OUTFALL 001

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
BOD ₅	27	10 mg/l	15 mg/l	Limits are set in accordance with the Statewide Sanitary Effluent Limitations Policy (SSELP) for facilities of this treatment type and size.
TSS	40	15 mg/l	23 mg/l	Since there is no numeric water quality criterion for TSS, and in accordance with the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility.

Other Effluent Limitations:

1) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) pH

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time. (Limits as established through BPJ considering BCT for similar waste streams in accordance with LAC 33:IX.5905.C.).

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3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. PREVIOUS PERMITS:

LPDES Permit No. LA0081418: Issued: November 1, 2001
 Expired: October 31, 2006

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Daily Avg.</u>	<u>Daily Max.</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Report	Report	Continuous	Recorder
BOD ₅	10 mg/l	15 mg/l	2/month	Grab
TSS	15 mg/l	23 mg/l	2/month	Grab
Fecal Coliform Colonies	200	400	2/month	Grab

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of the files indicates the following inspections were performed during the period beginning October 11, 2004 and ending October 11, 2006 for this facility.

Date: September 12, 2005
 Inspector: LDEQ
 Findings and/or Violations:

No damage or overflow due to Hurricane Katrina.

Date: June 22, 2006
 Inspector: LDEQ
 Findings and/or Violations:

1. Complaint related inspection conducted. Complainant stated that treatment facility was not working properly and that there was a strong sewage odor.
2. Three-cell aerated lagoon appeared to be operating properly at the time of investigation.
3. Perimeter of lagoon was walked and no foul odors detected.
4. Mr. Stegall indicated that the cell one aerator had been broken and took several weeks to repair. This may have caused an odor problem.

B) Compliance and/or Administrative Orders

A review of the files indicates that there are no recent enforcement actions administered against this facility.

C) DMR Review

A review of the discharge monitoring reports for the period beginning July 1, 2004 through June 30, 2006 has revealed the following violations:

<u>Month</u>	<u>Parameter</u>	<u>DMR Reported Value</u>	<u>Permit Limit</u>
August 2004	TSS, Monthly Avg. Fecal Coliform, Weekly Avg.	19 mg/l >2,000 col/100 ml	15 mg/l 400 col/100 ml

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March 2005	BOD ₅ , Monthly Loading	33 lbs/day	27 lbs/day
	BOD ₅ , Monthly Avg.	14.9 mg/l	10 mg/l
	BOD ₅ , Weekly Avg.	26 mg/l	15 mg/l
	TSS, Monthly Loading	48 lbs/day	40 lbs/day
	TSS, Monthly Avg.	21.8 mg/l	15 mg/l
	TSS, Weekly Avg.	26 mg/l	23 mg/l
April 2005	TSS, Monthly Loading	47 lbs/day	40 lbs/day
	TSS, Monthly Avg.	23.4 mg/l	15 mg/l
	TSS, Weekly Avg.	34 mg/l	23 mg/l
September 2005	Fecal Coliform, Monthly Avg.	501 col/100 ml	200 col/100 ml
	Fecal Coliform, Weekly Avg.	840 col/100 ml	400 col/100 ml
October 2005	Fecal Coliform, Weekly Avg.	430 col/100 ml	400 col/100 ml
December 2005	BOD ₅ , Monthly Loading	28.9 lbs/day	27 lbs/day
	BOD ₅ , Monthly Avg.	13.5 mg/l	10 mg/l
	TSS, Monthly Avg.	17 mg/l	15 mg/l
March 2006	BOD ₅ , Monthly Loading	46.2 lbs/day	27 lbs/day
	BOD ₅ , Monthly Avg.	27 mg/l	10 mg/l
	BOD ₅ , Weekly Avg.	33 mg/l	15 mg/l
	TSS, Monthly Avg.	15.2 mg/l	15.2 mg/l
	Fecal Coliform, Monthly Avg.	355 col/100 ml	200 col/100 ml
	Fecal Coliform, Weekly Avg.	850 col/100 ml	400 col/100 ml
April 2006	BOD ₅ , Monthly Avg.	12.4 mg/l	10 mg/l
	Fecal Coliform, Monthly Avg.	501 col/100 ml	200 col/100 ml
	Fecal Coliform, Weekly Avg.	650 col/100 ml	400 col/100 ml
May 2006	Fecal Coliform, Monthly Avg.	562 col/100 ml	200 col/100 ml
	Fecal Coliform, Weekly Avg.	1,180 col/100 ml	400 col/100 ml
June 2006	Fecal Coliform, Monthly Avg.	501 col/100 ml	200 col/100 ml
	Fecal Coliform, Weekly Avg.	920 col/100 ml	400 col/100 ml

XII.

ADDITIONAL INFORMATION:

Please be aware that the Department will be conducting a TMDL in the Lake Pontchartrain Basin scheduled for completion in 2011. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions as a result of the TMDL. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the total expected flow of 0.2779 MGD.

Effluent loadings are calculated using the following example:

$$\text{BOD: } 8.34 \text{ lb/gal} \times 0.3199 \text{ MGD} \times 10 \text{ mg/l} = 27 \text{ lb/day}$$

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At present, the **Monitoring Requirements, Sample Types, and Frequency of Sampling** as shown in the permit are standard for facilities of flows between 0.10 and 0.50 MGD.

<u>Effluent Characteristics</u>	<u>Monitoring Requirements</u>	
	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Continuous	Recorder
BOD ₅	2/month	Grab
Total Suspended Solids	2/month	Grab
Fecal Coliform Bacteria	2/month	Grab
pH	2/month	Grab

XIII **TENTATIVE DETERMINATION:**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

XIV **REFERENCES:**

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Mo-Dad Utilities, LLC, Southwood Village, June 1, 2006.